

### **REMARKS**

Claims 1-108 remain pending in the present application. Claims 15-28, 35, 36, 45-51, 54-71, 98, 101, 102, 105 and 106 are allowed. Claims 3-13, 30-34, 38-42, 53, 77-97, 100 and 104 are allowable if rewritten in dependent form. Claims 1, 2, 14, 29, 37, 43, 44, 52, 75, 76, 99, 103, 107 and 108 are rejected. Claims 107 and 108 have been cancelled with traverse. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the remarks contained herein.

### **DRAWINGS**

Applicants have included herewith a set of Replacement Sheets of drawings to make formal, non-substantive changes to the drawings. Specifically, hand drawn elements and leader lines have been replaced with computer generated elements and leader lines. Accordingly, Applicants respectfully request entry of the Replacement Sheets of drawings.

### **REJECTION UNDER 35 U.S.C. § 102**

Claims 1, 2, 14, 29, 37, 43, 44, 52, 75, 76, 99, 103, 107, 108 stand rejected under 35 U.S.C. §102 as being anticipated by Moerke U.S. 5,258,599. Applicant respectfully requests reconsideration of these rejections in light of the following remarks.

Moerke discloses a welding system comprising a welding station and a docking or utilities distribution unit 70 fixedly mounted at the welding station. The docking or utilities distribution unit 70 which defines a cylindrical metal docking body 71 is used to removably mount a nozzle assembly by transfer fittings 190, and the counter bore portions 92, 107, and 114. Additionally, the gas leads 63 and 64 appear to be

connected to fittings 94a (shielding gas) and 97a (plasma gas), however, Moerke is silent as to the specific connection of the end of the gas leads to their respective fittings. Moreover, the fittings 94a and 97a are **brazed** to the docking body 71 (Col. 7, Lines 50-52).

Moerke cannot anticipate Claim 1 because Moerke does not disclose a quick disconnect operatively engaged between the torch head and the torch lead, moreover that provides for quick assembly and disassembly of the torch head and torch lead. Moerke is silent as to the specific type of connection between the end of the gas leads and their respective fittings.

Claim 1 defines a modular plasma arc torch comprising a torch head, a torch lead and a **quick disconnect** for quick assembly and disassembly of the torch head and the torch lead. Since Moerke does not disclose such a quick disconnect, Claim 1 cannot be anticipated. Accordingly, Applicants respectfully request that the rejection of Claim 1 be withdrawn.

Claims 2 and 14 each depend from Claim 1 and distinguish over Moerke for at least the reasons stated above in connection with Claim 1. Accordingly, Applicants respectfully request that the rejection of Claims 2 and 14 also be withdrawn.

Claim 29 stands rejected under 35 U.S.C. §102 as being anticipated by Moerke. Claim 29 defines a plasma arc torch head with a quick disconnect member disposed within a proximal end of the torch head for quickly assembling/disassembling the plasma arc torch head to/from a torch component within the plasma arc torch, wherein the quick disconnect member conducts both gas and electric power through the plasma arc torch.

Moerke cannot anticipate Claim 29 since Moerke does not disclose a quick disconnect member disposed within a proximal end of a torch head. Additionally, Moerke does not disclose how a single quick disconnect member can achieve the conduction of both gas and electric power. Moerke uses three transfer fittings to connect the water hose, the shield gas hose, and the plasma gas hose, respectively, and thus cannot provide a suggestion or motivation that conduction of gas and electricity can be achieved by using a single disconnect member. Moreover, the docking or utilities distribution unit 70 of Moerke is used to connect a nozzle assembly to a utility delivery system 60 fixedly mounted at the welding system, rather than to a torch component within a plasma arc torch, as defined in Claim 29. Finally, in Moerke, the fittings used to quickly assemble/disassemble the nozzle assembly to/from the docking unit 70 are not disposed **within** the nozzle assembly (or a torch head). Accordingly, Applicants respectfully request that the rejection of Claim 29 be withdrawn.

Claims 37, 43, and 44 stand rejected under 35 U.S.C. §102 as being anticipated by Moerke. Claims 37, 43, and 44 each define a plasma arc torch lead with a quick disconnect member. The quick disconnect member is disposed within a distal end of the torch lead in Claim 37, within a proximal end of the torch lead in Claim 43 and within each end of the torch lead in Claim 44. Applicant respectfully submits that Claims 37, 43 and 44 are not anticipated by Moerke because Moerke does not disclose a plasma arc torch lead having a quick disconnect at its distal end, let alone a quick disconnect member disposed **within** the torch lead to allow quick assembly/disassembly of the torch lead to/from a torch component within the plasma arc torch **as well as to conduct**

**both gas and electric power**, as defined in Claims 37, 43 and 44. Accordingly, Applicants respectfully request that the rejection of Claims 37, 43 and 44 be withdrawn.

Claim 52 stands rejected under 35 U.S.C. §102 as being anticipated by Moerke. Claim 52 defines a gas control device with a quick disconnect member disposed within the gas control device, wherein the quick disconnect member conducts both gas and electric power through the plasma arc torch. Applicant respectfully submits that Claim 52 is not anticipated by Moerke because Moerke does not disclose a gas control device having a quick disconnect member let alone a single quick disconnect member for conducting both gas and electric power as defined in Claim 52. Accordingly, the Applicants respectfully request that the rejection of Claim 52 be withdrawn.

Claims 75-76 stand rejected under 35 U.S.C. §102 as being anticipated by Moerke. Claim 75 defines a modular plasma arc torch comprising a plurality of torch components and a plurality of quick disconnects operatively engaged **between the plurality of torch components**. Moerke cannot anticipate Claim 75 because Moerke does not disclose a plurality of quick disconnects operatively engaged between the torch components. Moerke provides only one disconnect between the nozzle assembly and the docking unit. The docking unit does not have any quick disconnects for assembling/disassembling the docking unit to/from the utility delivery system. The docking unit and the utility delivery system are fixedly connected. Accordingly, Applicants respectfully request that rejection of Claim 75 be withdrawn.

Claim 76 depends from Claim 75 and distinguishes over Moerke for at least the reasons stated above in connection with Claim 75. Accordingly, Applicants respectfully request that the rejection of Claim 76 be withdrawn.

Claim 103 stands rejected under 35 U.S.C. §102 as being anticipated by Moerke. Referring to the arguments above in connection with Claim 1, since Moerke does not anticipate a modular plasma arc torch with a quick disconnect operatively engaged between the torch head and the torch lead, Moerke cannot anticipate a method of disassembling a plasma arc torch in which the torch head and the torch lead are quickly disassembled. Accordingly, Applicants respectfully request that the rejection of Claim 103 also be withdrawn.

Claims 107 and 108 stand rejected under 35 U.S.C. §102 as being anticipated by Moerke. Claims 107 and 108 have been cancelled with traverse and thus these claim rejections are now moot.

#### **CLAIMS 72-74**

The Outstanding Office Action does not state whether Claims 72-74 are allowed, objected to, or rejected. Claim 72 is directed to a quick disconnect member with, among others, a tapered internal shoulder to facilitate insertion of an adjacent quick disconnect. Claim 73 depends from Claim 72. Claim 74 defines a quick disconnect member with, among others, a non-conductive or insulative plug within a socket fitting for inhibiting electrical contact of an object inadvertently inserted within the socket fitting. Moerke cannot anticipate Claims 72-74 at least because Moerke does not disclose the above mentioned limitations as defined in Claim 72-74, respectively. Accordingly, Applicants submit that Claims 72-74 are patentable over Moerke.

### **ALLOWABLE SUBJECT MATTER**

The Outstanding Office Action states that Claims 3-13, 30-34, 38-42, 53, 77-97, 100, and 104 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claim. Applicants submit that the independent claims from which these claims depend are patentable for at least the reasons stated above and thus these claims need not be rewritten. Additionally, Claims 53 and 94 within this group are independent claims, which Applicants submit are patentable for at least the reasons stated above. Therefore, these claims should now be in condition for allowance.

### **CONCLUSION**

It is believed that all of the stated grounds of objection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding objections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (314) 726-7524.

Respectfully submitted,

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### **AMENDMENTS TO THE DRAWINGS**

The attached "Replacement Sheets" of drawings include changes to Figures 1-13. The attached "Replacement Sheets," which include Figures 1-13, replace the original sheets and the replacement sheet filed on October 13, 2004, including Figures 1-13.

Attachment: Replacement Sheets